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February 6, 2006

ELECTRONIC FILING

EB-06-TC-060

Certification of CPNI Filing, February 6, 2006

Federal Communications Commission
Enforcement Bureau
445 12th Street, S.W.
Washington, D.C. 20554

Re: EB-06-TC-060
Certification of CPNI Filing, February 6, 2006
Pilgrim Telephone, Inc. ("Pilgrim")

Dear Compliance Officer:

Provided with this letter please find the February 6, 2006, Certification of CPNI Filing for Docket No. EB-06-TC-060. This filing contains a copy of Pilgrim's CPNI Compliance Program and a Certification executed by Stephen E. Bonder, Vice-President of Pilgrim.

Please direct any questions or comments to the undersigned.

Very truly yours,



Walter Steimel, Jr.

Encl. (2)

cc: Byron McCoy (via e-mail byron.mccoy@fcc.gov)
Best Copy and Printing, Inc. (via e-mail fcc@bcpiweb.com)
Pilgrim Telephone, Inc.

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STATEMENT OF CPNI COMPLIANCE PROCEDURES

Pilgrim Telephone, Inc. ("Pilgrim") has established and implemented internal operating procedures which are designed to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, (Privacy of Customer Information) and with the Federal Communications Commission's rules governing Customer Proprietary Network Information (CPNI) which are codified at 47 C.F.R. Part 64, Subpart U.

Primary responsibility for Pilgrim's CPNI practices and policies resides with the company's Vice-President in consultation with its President and outside counsel. Those corporate officers have reviewed Section 222 and the FCC's CPNI rules and are thoroughly familiar with their requirements.

Pilgrim recognizes that it may use, disclose or permit access to CPNI to provide or market service offerings among the categories of service to which a customer has already subscribed, and for the purposes outlined in 47 U.S.C. § 222(d). Pilgrim also recognizes that when it provides more than one category of service to a customer it may share the customer's CPNI with the affiliate, if any, that provides the service to the customer, and that it may not provide CPNI to affiliates that do not provide service to the customer without the customer's prior approval.

Pilgrim does not make available to any unaffiliated entity, or to any affiliated entity that does not already provide service to a customer, information which meets the definition of CPNI codified at 47 U.S.C. § 222(h)(1), except when required to do so by law (e.g., when subject to a properly-issued subpoena by law enforcement departments), or as permitted under 47 U.S.C. § 222(d).

Pilgrim will disclose to a customer that customer's own CPNI information. It will also disclose that CPNI information to a person specifically designated by the customer such as, for example, an attorney who represents the customer in a matter where the CPNI information is necessary to the attorney's effective representation of the customer, but only upon receiving a direct request in writing from the customer. Requests for CPNI are routinely routed to outside counsel for review in the event that there appears to be any question as to whether the request should be approved.

Pilgrim undertakes periodic reviews of its practices to ensure that it remains in compliance with CPNI rules. All Pilgrim personnel having access to CPNI have been instructed in Pilgrim's policies governing CPNI. Pilgrim requires each of its employees to sign confidentiality agreements and adhere to company policies protecting all confidential information, including confidential subscriber information, and trains its customer service representatives to conform to confidentiality practices. Pilgrim also requires all third party vendors (such as billing and collection agencies and other parties obtaining CPNI or any of its components under 47 U.S.C. § 222(d)) to execute agreements and comply with Pilgrim's policies protecting the confidentiality of all

information, including all customer information, which may come into their possession pursuant to 47 U.S.C. § 222(d).


As Pilgrim does not use CPNI for any purpose requiring customer approval and does not provide CPNI to unrelated entities (except when compelled to do so or as requested to do so by customers), it has not implemented either “opt-in” or “opt-out” approval procedures as those terms are defined at Section 64.2005 of the Commission’s rules. In the event that Pilgrim, in the future, would utilize CPNI or provide CPNI to other entities other than as described above, it will first provide customer notifications of their CPNI rights as required by the Commission’s rules.

These procedures and policies have been specifically approved by Pilgrim’s corporate officers.

COMPLIANCE CERTIFICATE

I, Stephen E. Bonder, am Vice-President of Pilgrim Telephone, Inc. (Pilgrim). I have personal knowledge that Pilgrim has established operating procedures that are adequate to ensure that Pilgrim is in compliance with the rules of the Federal Communications Commission which are codified at 47 C.F.R. Part 64 Subpart U (Customer Proprietary Network Information).

Date: February 6, 2006



Stephen E. Bonder
Vice-President
Pilgrim Telephone, Inc.